

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DARREN MOORE,

Plaintiff,

v.

LIEUTENANT E. JONES, POLICE OFFICER  
JANOSKEY, POLICE OFFICER COLON,  
POLICE OFFICER S. SALISBURY, CITY OF  
DETROIT POLICE DEPARTMENT and CITY  
OF DETROIT,

Defendant.

Case No.: 2:10-cv-11824  
Hon. Stephen J. Murphy, III  
Magistrate Judge: Mona K. Majzoub

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SERLIN, TRIVAX & STEARN, PLLC  
By: David B. Trivax (P38798)  
Attorney for Plaintiff  
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Bingham Farms, MI 48025  
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MARION R. JENKINS (P26257)  
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Attorney for Defendant City of Detroit  
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**DISCOVERY PLAN PURSUANT TO FRCP 26(f)(3)**

NOW COMES Plaintiff, Darren Moore, by and through his attorneys Serlin, Trivax & Stearn, PLLC and Defendants, City of Detroit, Lieutenant E. Jones, Police Officer Janoskey, Police Officer Colon, Police Officer S. Salisbury by and through their attorney, Marion R. Jenkins, and do hereby submit the following Discovery Plan pursuant to FRCP 26(f)(3), as follows:

1. The defendant requests and plaintiff concurs on the exchange of disclosures under rule FRCP 26(a) within 30 days of this Court's Scheduling Order on May 17, 2011.
2. The Parties concur that discovery will be required on the issue of liability of the City as well as individual defendants in addition to the damages sustained by the plaintiff.

3. The Parties further request discovery be allowed for 180 days from the date of this Court's Scheduling Order.

4. The Parties do not anticipate any issue regarding the disclosure of discovery of electronically stored information at this time.

5. The Parties do not anticipate any claims of privilege or of protection as to trial preparation materials.

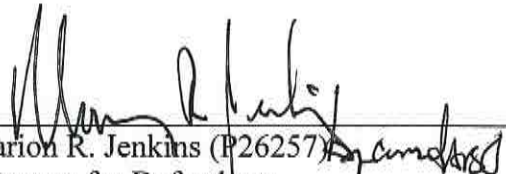
6. The Parties do not request any changes or limitations be imposed different than those under the Federal Civil Procedure or local court rules regarding discovery.

Approved as to form and substance:

SERLIN, TRIVAX & STEARN, PLLC

MARION R. JENKINS

  
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David B. Trivax (P38798)  
Attorney for Plaintiff

  
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Marion R. Jenkins (P26257)  
Attorney for Defendants

Dated: 5/2/11\_\_\_\_\_

Dated: 5/5/11\_\_\_\_\_